

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

NICOL JACKSON, )  
Plaintiff, )  
v. ) Civil Action No. 3:21-cv-00720  
KINGDOM HALL OF JEHOVAH ) Judge Trauger  
WITNESS, *et al.*, ) Magistrate Judge Newbern  
Defendants. )

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**DEFENDANTS' MOTION TO STAY DISCOVERY OR, IN THE ALTERNATIVE, FOR  
ADDITIONAL TIME TO RESPOND TO PLAINTIFF'S DISCOVERY REQUESTS**

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Defendants Watch Tower Bible and Tract Society of Pennsylvania (“Watch Tower”) and Paris TN Congregation of Jehovah’s Witnesses (the “Paris Congregation”) (collectively, “Defendants”) move to stay discovery in this case until the resolution of their pending Motion to Transfer (Dkt. No. 19) and their anticipated subsequent dispositive motion regarding the legal sufficiency of Plaintiff’s pleadings. Such a stay would be consistent with this Court’s standard practice (in non-*pro se* cases) of effectively staying discovery until after challenges to the sufficiency of a plaintiff’s complaint are resolved. In the alternative, and pursuant to Fed. R. Civ. P. 33(b)(2), Watch Tower and the Paris Congregation request the Court to extend the deadline to object and respond to Plaintiff’s interrogatories until 60 days after an order is entered on this Motion.

This Motion is supported by the simultaneously filed Memorandum, any matters subject to judicial notice, and any further submissions or arguments of counsel as may properly come before this Court.

Defendants ask that this Motion be granted and that the Court stay discovery in the above-captioned action until the pending Motion to Transfer and the anticipated motion regarding the legal sufficiency of Plaintiff's pleadings are resolved. Alternatively, Defendants ask the Court to grant them an extension of the deadline to respond to Plaintiff's interrogatories until 60 days after an order is entered on this Motion.

Respectfully submitted,

s/ Robb S. Harvey  
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*Counsel for Defendants Watch Tower Bible and Tract Society of Pennsylvania and Paris TN Congregation of Jehovah's Witnesses*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed using the Court's ECF System on March 4, 2022. In addition to anticipated service to Plaintiff through the Court's ECF System, the undersigned will ask his team members to send a copy of this submission via email and via first-class U.S. Mail, postage pre-paid, upon Plaintiff:

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s/ Robb S. Harvey